

FILED
IN OPEN COURT

OCT 15 2014

CLERK, U.S. DISTRICT COURT
NEWPORT NEWS, VA

(In violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (C)).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 2, 2014, in Williamsburg, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, DION BARTLETT, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a mixture or substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (C)).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 3, 2014, in Williamsburg, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, DION BARTLETT, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a mixture or substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance within 1000 feet of a playground.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and 860).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 9, 2014, in Williamsburg, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, DION BARTLETT, did unlawfully, knowingly and intentionally distribute a mixture or substance containing a mixture or substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (C)).

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER CHARGES THAT:

A. The defendant, DION BARTLETT, if convicted of the violations alleged in Counts One-Four of the indictment, shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and
2. Any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.
3. If any property that is subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In violation of Title 21, United States Code, Section 853.)

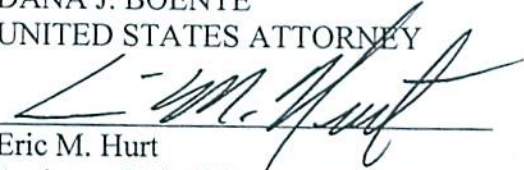
UNITED STATES V. DION BARTLETT, 4:14CR 64

A TRUE BILL ~~REDACTED COPY~~

FOREPERSON

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